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September 5, 2024

***Delivered Via E-Mail***

The Honorable Analisa Torres  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

***In re: United States of America v. Juan Tacuri***  
**Case No. 1:22-CR-00622-AT-2**  
**United States District Court for the Southern District of New York**

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Dear Judge Torres:

I represent Defendant, Juan Tacuri, who entered his plea of guilty to the charge of Conspiracy to Commit Wire Fraud, in violation of Title 18 U.S.C. §1349, on June 5, 2024.

Presently, the Sentencing Hearing is scheduled for October 15, 2024 at 2:00 p.m. [D.E. 108]. The Court previously entered its order providing that the respective sentencing submissions be filed by Defendant by September 6, 2024, and the Government's submission be filed by September 13, 2024.

As a result of other federal court obligations in various districts, the defense is in need of a two (2) week extension of time beyond the September 6, 2024 date in which to prepare and file the Defendant's sentencing submission.

Additionally, I have been in contact with A.U.S.A. Benjamin A. Gianforti, and he has advised that the Government does not oppose this motion and joins in this request, and in-fact requests that the time for the Government to file their sentencing submission be extended by two (2) weeks beyond the September 13, 2024 date as well.

This joint letter motion is submitted in the utmost of good faith and in the interest of justice, and is not the result of a lack of due diligence.

Respectfully submitted,

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/s/ **Frank J. Gaviria**  
Frank J. Gaviria, Esq.  
Fla. Bar No. 979058

cc: Benjamin A. Gianforti, A.U.S.A.  
Michael Maimin, A.U.S.A.

GRANTED. Defendant shall file his sentencing submission by **September 20, 2024**, and the Government shall file its submission by **September 27, 2024**.

SO ORDERED.

Dated: September 5, 2024  
New York, New York



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ANALISA TORRES  
United States District Judge